

**EXHIBIT “A”**  
**Declaration of**  
**David Anderman**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

AARON ABADI,

Plaintiff

v.

AMERICAN AIRLINES, INC., et al.,

Defendants.

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Case No. 1:23-cv-04033-LJL

**DECLARATION OF DAVID ANDERMAN, ESQ. IN SUPPORT OF  
THE MOTION TO DISMISS OF DEFENDANT SOUTHERN  
AIRWAYS EXPRESS, LLC D/B/A MOKULELE AIRLINES**

I, DAVID ANDERMAN, hereby declare and state as follows:

1. I am over 18 years of age, of sound mind, and otherwise competent to make this Declaration.
2. I am the Chief Legal Officer of Surf Air Mobility Inc. ("Surf Air"), which is the parent of Southern Airways Express, LLC, which in turn owns Mokulele Airways ("Mokulele"), which has been named as a defendant in this case.
3. Southern Airways is based in Palm Beach, Florida at 2875 South Ocean Boulevard, Suite 256, Palm Beach, Florida 33480. Its Hawaiian operation, known as Mokulele, is based in Hawaii. The business address for Surf Air is 12111 S. Crenshaw Blvd, Hawthorne, California, 90250.
4. I submit this Declaration in support of Mokulele's Motion to Dismiss.
5. I am familiar with the facts and allegations contained in Plaintiff's Complaint and Supplemental Complaint, and submit this Declaration based upon my personal knowledge and/or my review of the records of Southern and Mokulele that are created and maintained in the regular course of its business.
6. Southern Airways is a limited liability company organized and existing under the laws of Delaware with its principal place of business in Florida. It is engaged in the business of the carriage by air of passengers, baggage and cargo.
7. Southern Airways has never maintained a principal place of business in New York or Texas.
8. Southern' Airways' Hawaiian branded airline Mokulele only flies within the State of Hawaii. It does not operate in the State of New York or Texas. It was Mokulele in Hawaii which Plaintiff Aaron Abadi contacted regarding its masking policy.

9. Exhibit 58 of the Plaintiff's Complaint are e-mails between Aaron Abadi and Mokulele dated September 2, 2021 and September 6, 2021.
10. At all times relevant to the Complaint, Southern Airways' base of operations was and currently is located in Florida.
11. According to Mokulele's records, Aaron Abadi did not: make a reservation for travel on a Mokulele flight between September 2021 and the present; enter into or purchase a contract of carriage for travel on a Mokulele flight between September 2021 and the present; and did not travel on any Mokulele flight between September 2021 and the present.
12. Although Southern Airways has a few employees who work remotely from headquarters and reside in New York, neither Southern Airways nor Mokulele has a physical office or facility in New York.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on February 26, 2024

  
DAVID ANDERMAN